

Carsten, Douglas

From: Carsten, Douglas
Sent: Tuesday, April 01, 2008 7:04 AM
To: 'mak@kramerlawip.com'
Cc: 'michael@kalerlaw.com'; Nye, Debra
Subject: Re: Sorensen v Sanyo

Hello Ms. Kramer,

Please let me know when you expect to be in a position to share Sorensen's stay proposal. Thanks very much in advance.

Doug Carsten
 Sent from my Blackberry wireless handheld.

----- Original Message -----

From: mak@kramerlawip.com <mak@kramerlawip.com>
 To: Carsten, Douglas
 Cc: michael@kalerlaw.com <michael@kalerlaw.com>; esbjork@gmail.com <esbjork@gmail.com>
 Sent: Wed Mar 05 08:28:11 2008
 Subject: RE: Sorensen v Sanyo

Dear Mr. Carsten,

I will prepare a stipulation and forward it to you promptly. I am out of town today, but should have it ready for you tomorrow. Also, we will endeavor to have a proposal regarding discovery to you by March 31st.

Sincerely,

Melody A. Kramer

> ----- Original Message -----
 > From: "Carsten, Douglas" <DCarsten@foley.com>
 > To: mak@kramerlawip.com
 > Subject: RE: Sorensen v Sanyo
 > Date: Tue, 4 Mar 2008 13:51:00 -0800
 >
 >
 > Hello Ms. Kramer,
 >
 > Thank you for your email. Sanyo accepts your offer of an additional
 > thirty days in which to respond to the complaint. By my calculation,
 > that would place Sanyo's response date up to and including April 9,
 > 2008. If my calculation is incorrect, please do not hesitate to let
 > me know. In addition, please let me know if you would be so kind as
 > to prepare a suitable stipulation acceptable to Sorensen for my review.
 >
 > I presume from your email that this extension will serve to allow you
 > to further determine the terms Sorensen would request in connection
 > with a proposed partial stay. I would appreciate your providing to me
 > whatever proposal Sorensen has in mind for such a partial stay on or
 > before March 31, 2008 so that Sanyo has appropriate time to digest
 > your proposal in advance of the response date. I would also request
 > that such a proposal specifically set forth what discovery (if any)
 > Sorensen would request in connection with such a partial stay. Please
 > let me know at your earliest convenience if you agree to providing
 > that information in the stated timeframe.
 >
 > I look forward to hearing from you.
 >
 > Truly yours,
 >
 > Doug Carsten

>
 > -----Original Message-----
 > From: mak@kramerlawip.com [mailto:mak@kramerlawip.com]
 > Sent: Tuesday, March 04, 2008 9:59 AM
 > To: Carsten, Douglas
 > Cc: michael@kaler.com
 > Subject: Sorensen v Sanyo
 >
 > Dear Mr. Carsten:
 >
 > Thank you for your email of February 28th.
 > Based on some recent developments, I will not be in a position to
 > forward you a proposed stipulation for partial stay of this case yet.
 > Comments by Judge Moskowitz in a related proceeding (transcript
 > attached), as well as new information that we presented to the Court
 > in opposition to another motion for stay (memorandum attached), place
 > the entire landscape of the scope and duration of any stay that the
 > Court may enter in substantial question.
 >
 > If Sanyo would like to have an additional 30 days before having to
 > respond to the Complaint, we are amenable to such a stipulation.
 >
 > Melody A. Kramer
 > Kramer Law Office, Inc.
 > 9930 Mesa Rim Road, Suite 1600
 > San Diego, CA 92121
 > 858/362-3150 direct
 > 858/824-9073 fax
 >
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 >

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